

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
)	Chapter 11
)	
FULLER'S SERVICE CENTER INC.,)	No. 25-01345
)	
<i>Debtor and Debtor-in-Possession.</i>)	Hon. Deborah L. Thorne
)	Hearing: 9/22/25 at 9:00 a.m.

**THE RICHARDS' WITNESS LIST
FOR SEPTEMBER 22, 2025 EVIDENTIARY HEARING**

Brian and Kristine Richards, in their capacity as Independent Administrators of the Estate of Sean Patrick Richards, deceased (the “***Richards***”), by and through their undersigned counsel, pursuant to this Court’s Trial Order [Docket No. 113], hereby submit the following witness list (this “***Witness List***”) for the evidentiary hearing scheduled for September 22, 2025 at 9:00 a.m. on the United States Trustee’s Motion to Dismiss or Convert, or in the Alternative to Appoint a Trustee [Docket No. 93] and the Richards’ Motion for the Appointment of a Chapter 11 Trustee [Docket No. 99] (collectively, the “***Motions for a Chapter 11 Trustee***”).

WITNESS LIST

The Richards will call all of the following to testify:

WITNESS	CONTACT INFORMATION	GENERAL DESCRIPTION OF TESTIMONY
Douglas A. Fuller, Jr., President, Director, Shareholder and Owner of the Debtor	Telephone: 630-325-0088 Email: da.fuller@yahoo.com	Mr. Fuller is expected to testify regarding the Debtor’s business operations, the Debtor’s leases, the reasons the Debtor sought Chapter 11 protection, the Debtor’s financial reporting, the Debtor’s filings with the Bankruptcy Court, entries on the Debtor’s financial statements and tax returns, the removal of certain items from the Debtor’s

		financial statements, the Debtor's relationship with affiliates, and the Debtor's plans in bankruptcy..
Susan Headley, Comptroller of the Debtor	Telephone: 630-325-0088 Email: susan@fullers7.com	Ms. Headley is expected to testify regarding the Debtor's business operations, the Debtor's leases, the reasons the Debtor sought Chapter 11 protection, the Debtor's financial reporting, the Debtor's relationship with affiliates, the Debtor's filings with the Bankruptcy Court, entries on the Debtor's financial statements and tax returns, the removal of certain items from the Debtor's financial statements, and communication with the Debtor's CPA.
Michael Phillips, CPA of Kuhn & Company, the Debtor's Accountant	Telephone: 630-681-8100 (x102) 630-926-7327 Email: mphilips@kuhnandcompany.com	Mr. Phillips is expected to testify regarding the Debtor's financial statements and tax returns, and the removal of certain items from the Debtor's financial statements and the reasons therefor.

The Richards may call some or all of the following to testify:

WITNESS	CONTACT INFORMATION	GENERAL DESCRIPTION OF TESTIMONY
Susan Groenewold, Director, Secretary, Shareholder and Owner of the Debtor	Telephone: 630-325-0088; Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	Ms. Groenewold may testify regarding the Debtor's business operations, ownership structure, plans reasons for seeking Chapter 11 protection, plans in bankruptcy, relationship with the Debtor's affiliates, tax returns, entries on the financial statements, the removal of items from the Debtor's financial statements and the loan made by the Debtor to her.

Paula Fuller, Shareholder and Owner of the Debtor	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	Ms. Fuller may testify regarding the Debtor's business operations, ownership structure, plans reasons for seeking Chapter 11 protection, plans in bankruptcy, and relationship with the Debtor's affiliates.
Colin Fuller, Shareholder and Owner of the Debtor	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	Mr. Fuller may testify regarding the Debtor's business operations, ownership structure, plans reasons for seeking Chapter 11 protection, plans in bankruptcy, and relationship with the Debtor's affiliates.
Adam Fuller, Shareholder and Owner of the Debtor	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	Mr. Fuller may testify regarding the Debtor's business operations, ownership structure, plans reasons for seeking Chapter 11 protection, plans in bankruptcy, and relationship with the Debtor's affiliates.
Ethan Fuller, Shareholder and Owner of the Debtor	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	Mr. Fuller may testify regarding the Debtor's business operations, ownership structure, plans reasons for seeking Chapter 11 protection, plans in bankruptcy, and relationship with the Debtor's affiliates.
Corporate Representative of Munn Holdings, LLC	Through Agent, Michael Kite 1900 S. Highland Ave. Ste. 100 Lombard, IL 60148	This witness may testify regarding the Debtor's sale of assets prior to filing for bankruptcy, the Debtor's movement of sale proceeds, and distributions made to owners of the Debtor.
Corporate Representative of Fuller's Home & Hardware, Inc.	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	This witness may testify regarding its relationship with the Debtor, including shared assets and ownership.

Corporate Representative of 102 W. Chicago, LLC	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	This witness may testify regarding its relationship with the Debtor, including shared assets and ownership, and certain of the Debtor's leases.
Corporate Representative of Douglas Fuller Family Limited Partnership	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	This witness may testify regarding its relationship with the Debtor, including shared assets and ownership, and certain of the Debtor's leases.
Corporate Representative of D.A. Fuller Corporation	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	This witness may testify regarding its relationship with the Debtor, including shared assets and ownership, and certain of the Debtor's leases.
Corporate Representative of Fuller's Real Estate Holdings, L.L.C.	Through Counsel, Shelly DeRousse Telephone: 312-360-6315 Email: sderousse@sgrlaw.com	This witness may testify regarding its relationship with the Debtor, including shared assets and ownership, and certain of the Debtor's leases.
David K. Welch, Attorney for the Debtor	Telephone: 312-840-7122 Email: dwelch@burkelaw.com	This witness may testify regarding the Debtor's decision to remove certain assets and liabilities from its financial statements prior to filing for bankruptcy and subsequently attempt to reinstate such items.
Corporate Representative from Heartland Bank and Trust Company, Secured Creditor of the Debtor	Telephone: 815-439-5289 Email: tle@hbtbank.com	This witness may testify regarding its treatment under the Amended Plan and its relationship with the Debtor and Debtor affiliates and principals.
Corporate Representative from Carroll's, LLC, d/b/a National Tire Wholesale, Inc., Secured Creditor of the Debtor	Telephone: 561-383-3000 Email: legal@TBCCorp.com	This witness may testify regarding its treatment under the Amended Plan.

RESERVATION OF RIGHTS

The Richards reserve the right to call any additional witnesses necessary to complete an impeachment, to lay an evidentiary foundation, to refresh recollection, to rebut evidence presented by the other party, or to address unforeseen evidence requirements.

Dated: September 08, 2025
Chicago, Illinois

By: s/ Louise Kathleen Simpson

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